

United States Courts
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

February 19, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

JOVANNA NETZAY DIAZ

§
§
§
§
§

CRIMINAL NO. **L-25-CR-308**

MGM

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about October 26, 2024, in the Southern District of Texas and elsewhere, and within the jurisdiction of the Court, Defendant,

JOVANNA NETZAY DIAZ,

did knowingly conspire and agree with other persons known and unknown to the grand jurors, to transport and move and attempt to transport and move within the United States by means of transportation and otherwise, an alien who had come to, entered, and remained in the United States in violation of law, in furtherance of such violation, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), (a)(1)(A)(v)(I), and (a)(1)(B)(i).

COUNT TWO

On or about October 26, 2024, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

JOVANNA NETZAY DIAZ,

knowing and in reckless disregard of the fact that A.B.L., a nine-year-old minor, was an alien who had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to transport and move such alien, within the United States, by means of transportation

and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and (a)(1)(B)(i).

COUNT THREE

On or about October 26, 2024, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

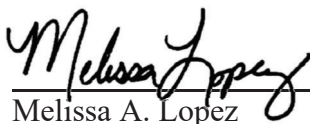
JOVANNA NETZAY DIAZ,

knowing and in reckless disregard of the fact that J.A.B.L., a nine-year-old minor, was an alien who had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to transport and move such alien, within the United States, by means of transportation and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and (a)(1)(B)(i).

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY



Melissa A. Lopez
Assistant United States Attorney